

Katten

575 Madison Avenue
New York, NY 10022-2585
+1.212.940.8800 tel
katten.com

MICHAEL M. ROSENSAFT
michael.rosensaft@katten.com
+1.212.940.6631 direct
+1.212.940.8776 fax

December 28, 2020

VIA ECF

The Honorable Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *United States v. Michael Cohn, 19 Cr. 97 (GRB)*

Dear Judge Brown:

This firm represents Michael Cohn in the above-referenced matter. On September 8, 2020, Mr. Cohn voluntarily waived indictment and pled guilty to a one-count misdemeanor information charging theft of government property whose value is less than \$1,000. Mr. Cohn's sentencing is currently scheduled for January 11th at 11:00 a.m.

Defense counsel writes to request that Mr. Cohn's sentencing be adjourned until early March at a date convenient to the Court. This request is being made in light of the current COVID-19 pandemic, for which all in-person proceedings have been temporarily suspended in accordance with Administrative Order 2020-26-1. In addition, this request is being made because the parties expect there to be a dispute as to the proper sentencing guidelines range and need additional time to submit briefing and to further discuss whether a sentencing hearing is necessary.

For the foregoing reasons, we respectfully request that Mr. Cohn's sentencing be adjourned to March at a date convenient to the Court. We further request that any sentencing submissions be due no later than three weeks before the date of the sentencing. Defense counsel spoke to the government who has no objection to this request.

Sincerely,

/s/ Michael M. Rosensaft

Michael M. Rosensaft